

Exhibit 7

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June 5, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: In re: General Motors LLC Ignition Switch Litigation,
14-MD-2543 (JMF)**

Dear Judge Furman:

Pursuant to this Court's Order No. 8 § V, Lead and Liaison Counsel and counsel for General Motors LLC ("New GM") submit this joint written update to advise the Court of matters of possible significance in proceedings related to MDL 2543.

First, on May 28, 2015, the Honorable Melodie Clayton heard argument on plaintiffs' and New GM's separate motions for leave to serve discovery in *Pate, et al. v. General Motors LLC, et al.*, No. 14A-2712-1 (Cobb County, Ga.), which were the subject of the parties' May 22, 2015 joint letter to the Court. (*See* Doc. No. 978.) A written order is pending. At the hearing, Judge Clayton granted New GM's motion for leave, while granting in part and denying in part plaintiffs' motion. New GM and the *Pate* plaintiffs were directed to submit a consent order with respect to the permitted discovery.

Second, on June 1, 2015, New GM submitted a supplemental brief regarding New GM's motion for entry of the MDL 2543 Coordination Order in *Mathes v. General Motors LLC*, No. CL12001623-00 (Augusta County, Va.), which was the subject of the parties' May 22, 2015 joint letter to the Court. (*See* Doc. No. 978.) A copy of New GM's brief is attached hereto as Exhibit 1. Plaintiffs' response is due June 15.

Third, on June 1, 2015, plaintiffs and New GM received notice that the hearing on plaintiffs' motion for sanctions in *Felix, et al. v. General Motors LLC*, No. 1422-CC09472 (City of St. Louis, Mo.), would be temporarily adjourned. New GM expects the hearing will be rescheduled for June 30 before the Honorable David Dowd, and New GM will file its response to the motion for sanctions prior to the hearing.

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Fourth, in compliance with the Honorable Robert E. Gerber's May 5, 2015 endorsed order (*see* Doc. No. 943), the parties are to apprise this Court of activity in the Bankruptcy Court which has a bearing on MDL 2543. In this regard, on May 27, 2015, Judge Gerber entered an endorsed order denying certain requests made by counsel for the Plaintiffs in the *Bledsoe* (MDL No. 1:14-cv-07631), *Elliott* (MDL No. 1:14-cv-08382), and *Sesay* (MDL No. 1:14-cv-06018) cases. Also on May 27, 2015, Judge Gerber entered his (i) Decision Re Form of Judgment, and (ii) Order Re Technical Matters Concerning Judgment ("Technical Matters Order"). On May 28, 2015, the plaintiff in *Pillars v. General Motors LLC*, No. 1:15-cv-11360-TLL-PTM (E.D. Mich.), which has been tagged for inclusion in this MDL, filed a no stay pleading with the Bankruptcy Court. New GM's response is due June 8, 2015. On May 29, 2015, as authorized by the Technical Matters Order, the following parties filed letters with the Bankruptcy Court regarding technical matters concerning the proposed judgment for the Bankruptcy Court's April 15, 2015 Decision on Motion to Enforce Sale Order ("April 15 Decision"): (i) counsel for New GM, (ii) counsel for the *Bledsoe*, *Elliott* and *Sesay* plaintiffs, (iii) counsel for the Ignition Switch Pre-Closing Accident Plaintiffs, and (iv) counsel for the Motors Liquidation Company GUC Trust. Also on May 29, 2015, counsel for New GM filed a letter with the Bankruptcy Court requesting a procedural stay of certain appellate matters. On June 1, 2015, counsel for New GM filed a letter with the Bankruptcy Court responding to one of the letters filed in response to the Technical Matters Order. Also on June 1, 2015, Judge Gerber entered his Judgment in connection with the April 15 Decision, and an Order, Pursuant to 28 U.S.C. § 158(d), and Fed. R. Bankr. P. 8006(e), Certifying Judgment for Direct Appeal to Second Circuit. To date, three Notices of Appeal have been filed in connection with the Judgment. Copies of the foregoing documents are attached hereto as Exhibits 2–15, respectively.

Fifth, pursuant to Order No. 1 § X.8, the Defendants' July 21, 2014 Status Letter (Doc. No. 73) included an Exhibit A listing cases consolidated to date in MDL 2543, as well as an Exhibit B listing related cases pending in state and federal court, together with their current status. For the Court's convenience, updated versions of Exhibits A and B are attached hereto as Exhibit 16.

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Finally, the parties continue to work to ensure that the Court is provided with current and correct contact information for presiding judges in actions listed in the aforementioned Exhibit B. To that end, the Federal/State Liaison Counsel intends to shortly submit to the Court updates, if any, to the e-mail addresses of the presiding judges in Related Actions.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.
/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Robert E. Gerber
Lead Counsel for Plaintiffs
Federal/State Liaison Counsel
Plaintiff Liaison Counsel
Counsel of Record for Defendants